

SEAN A. O'KEEFE – State Bar No. 122417
OKEEFE & ASSOCIATES
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Counsel to Elliot B. Lander, defendant

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

GLENROY COACHELLA, LLC

Debtor.

RICHARD A. MARSHACK, solely in his
capacity as Chapter 7 Trustee for the
bankruptcy estate of Glenroy Coachella, LLC,

Plaintiff,

vs.

ASR DEVELOPMENT CO, a California
corporation; DESERT MEDICAL
PROPERTIES, INC., a California
corporation; ABRAHAM STUART RUBIN,
an individual; JOSEPH RUBIN, an individual;
DR. ELLIOT B. LANDER, an individual; and
GARY STIFFELMAN as trustee for the
STIFFELMAN FAMILY TRUST,

Defendants.

Case No. 2:21-bk-11188-BB

Adv. No. 2:23-ap-01080-BB

Chapter 7

**DECLARATION OF SEAN A.
O'KEEFE IN SUPPORT OF MOTION
TO DISMISS ALL CLAIMS IN
COMPLAINT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 12(b)(6)**

DATE: April 12, 2023

TIME: 10:00 a.m.

PLACE: Courtroom 1539 of the Edward
R. Roybal Federal Building and
Courthouse at 255 E. Temple Street, Los
Angeles, California

DECLARATION OF SEAN A. O'KEEFE

I, Sean A. O'Keefe, hereby declare and state as follows:

1. I am over the age of eighteen years and the facts stated herein are within my personal knowledge.

2. I am a filer on the CM-ECF system maintained by the United States Bankruptcy Court for the Central District of California.

3. Attached hereto as Exhibit "A" is a true and correct copy of the UNANIMOUS WRITTEN CONSENT and the CERTIFICATE OF RESOLUTIONS OF GLENROY COACHELLA, LLC filed by Glenroy Coachella, LLC as attachments to docket number 1 in this case. I obtained this document from CM-ECF system.

4. Attached hereto as Exhibit "B" is a true and correct copy of the CHAPTER 11 TRUSTEE'S MOTION FOR ORDER APPROVING AGREEMENT RE: ESTATE'S RECEIPT OF DEEDS FROM TENANTS-IN-COMMON filed as docket number 295 in this case. I obtained this document from CM-ECF system.

I declare the foregoing is true and correct under the penalty of perjury.

Executed this 20 day of March 2023 in Orange County, California.

/s/ Sean A. O'Keefe

Sean A. O'Keefe

EXHIBIT A

**UNANIMOUS WRITTEN CONSENT
GLENROY COACHELLA, LLC**

The undersigned, being the Member and the Independent Manager of Glenroy Coachella, LLC, a Delaware limited liability company (the “Company”), in accordance with the Delaware Limited Liability Company Act, 6 *Del. C.* § 18-101 *et. Seq.* and the Amended and Restated Limited Liability Company Agreement of Glenroy Coachella, LLC, effective as of March 28, 2018 (the “Agreement”), do hereby consent to, adopt, authorize and approve the following resolutions as of February 5, 2021,

WHEREAS, the Member and the Independent Manager have considered the financial and operational conditions of the Company; and

WHEREAS, the Member and the Independent Manager have reviewed certain financial and other documents and the advice and recommendation of the Company’s professionals and advisors with respect to the options available to the Company, including the possibility of pursuing a restructuring of the Company’s business and assets under title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”); and

NOW, THEREFORE, IT IS HEREBY RESOLVED, that after consideration of the alternatives and the advice of the Company’s professionals and advisors, the Member has determined in its business judgment that it is in the best interests of the Company, its creditors, interest holders, and other interested parties and the Independent Manager having been asked to consent to a Material Action pursuant to Section 9(d)(XX) of the Agreement, and considering her fiduciary duties, if any, as provided under the Agreement, that a voluntary petition be filed by the Company seeking relief under the provisions of the Bankruptcy Code in the United States Bankruptcy Court for the Central District of California (the “Petition”), and the filing of such Petition be, and hereby is, authorized in all respects; and it is

FURTHER RESOLVED, that Stuart Rubin and such other additional persons as may be designated by the Member and any other officer or person designated hereby are appointed as authorized signatories and representatives in connection with the bankruptcy proceeding authorized herein (collectively the “Authorized Representatives”); and it is

FURTHER RESOLVED, that the Authorized Representatives are, and each of them hereby is, authorized and empowered on behalf of the Company to execute and verify the Petition in the name of the Company under the Bankruptcy Code and to cause the same to be filed; and it is

FURTHER RESOLVED, that the Authorized Representatives are, and each of them hereby is, authorized to work with the Company’s advisors to effectuate a restructuring under the Bankruptcy Code; and to file all motions and papers in the United States Bankruptcy Court for the Central District of California to obtain approval of such restructuring; and hereby authorized to execute appropriate agreements and related ancillary documents; and it is

FURTHER RESOLVED, that the Authorized Representatives are, and each of them hereby is, authorized and empowered, on behalf of and in the name of the Company, to negotiate, execute verify and file, or cause to be executed, verified and filed, all necessary documents, including, without limitation, all petitions, affidavits, schedules, motions, lists, applications, pleadings and other papers, and in that connection to employ and retain assistance by legal counsel, financial advisors, accountants and other professionals and to take any and all action which such Authorized Representative deems necessary and proper in connection with the bankruptcy case.

IN WITNESS WHEREOF, the undersigned Member and Independent Manager hereby consent to and approve and adopt these resolutions as of the date set forth above and direct that this Written Consent be filed with the Company's minutes and official records.

MEMBER:

GLENROY COACHELLA HOLDINGS LLC,
A Delaware limited liability company

By: 
Name: Stuart Rubin
Title: Manager

INDEPENDENT MANAGER:

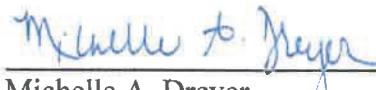

Michelle A. Dreyer

EXHIBIT “B”

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 CHAD V. HAES, #267221
chaes@marshackhays.com
3 MARSHACK HAYS LLP
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 11 Trustee,
7 RICHARD A. MARSHACK

8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

10
11 In re
12 GLENROY COACHELLA, LLC,
13 Debtor.

Case No. 2:21-bk-11188-BB

Chapter 11

CHAPTER 11 TRUSTEE'S MOTION FOR
ORDER APPROVING AGREEMENT RE:
ESTATE'S RECEIPT OF DEEDS FROM
TENANTS-IN-COMMON;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
RICHARD A. MARSHACK IN SUPPORT

17 Hearing:

18 [TO BE SET PURSUANT TO
19 APPLICATION FOR ORDER
SHORTENING TIME FILED
CONCURRENTLY]

20 TO THE HONORABLE SHERI BLUEBOND, UNITED STATES BANKRUPTCY JUDGE, THE
21 DEBTOR, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
22 PARTIES:

23 Richard A. Marshack, in his capacity as Chapter 11 Trustee ("Trustee") of the bankruptcy
24 estate ("Estate") of Glenroy Coachella, LLC ("Debtor"), respectfully submits this motion ("Motion")
25 for entry of an order approving his agreement with the non-debtor tenants-in-common pursuant to
26 which the estate has received 100% of title to the subject real property. In support of this Motion, the
27 Trustee respectfully represents as follows:
28

A. Summary of Argument

The Estate's most valuable asset is a 70.5% tenant-in-common interest in real property that is being developed into a luxury hotel in Coachella, California. To facilitate an expeditious sale of the property and to obviate the need for an adversary under Section 363(h) to sell co-owned property, the non-debtor tenants-in-common have agreed to deed their interests in the property to the Trustee. The deeds have been received and have been recorded. In exchange, Trustee has not promised any consideration to the tenants-in-common but has agreed to transfer the interests back to them if he abandons the estate's interests in the property. A true and correct copy of the Agreement is attached as Exhibit "1" to the Declaration of Richard A. Marshack ("Marshack Declaration"). To provide notice of the agreement to creditors and parties in interest, Trustee has filed this motion and respectfully requests that the Court enter an order approving the Agreement.

B. Background Information

On February 15, 2021, Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code.

On March 19, 2021, as Dk. No. 126, the Court entered an order approving the United States Trustee's application for the appointment of a Chapter 11 Trustee. Marshack Decl., ¶4.

Since his appointment, the Trustee and his professionals investigated and spent hundreds of hours conducting due diligence analyzing whether there was any value to be realized from the Property. *Id.*, ¶ 6.

Debtor's primary asset is a 70.5% interest in real property located at 84150 Avenue 48, Coachella, California 92201 ("Real Property"), which includes a luxury hotel project. Debtor owns the Real Property as a tenant-in-common with three other non-debtor entities: Force Rubin LLC (3.7885%); Force Rubin 2, LLC (21.2115%); and Coachella Resort, LLC (4.5%) (collectively, the "TICs").

Trustee has met with a number of parties interested in purchasing the Real Property. Trustee also has a signed letter of intent with one prospective purchaser. Also, Trustee is negotiating an agreement with U.S. Real Estate Credit Holdings III-A to obtain its consent to a sale free and clear.

1 Because all potentially interested buyers have required Trustee's ability to provide title to 100% of
2 the property, good cause exists for the Court to hear this matter on an expedited basis.

3 **C. Agreement for TICs to Transfer their Interests in the Real Property**
4 **to Trustee**

5 To facilitate a sale of the Real Property, the TICs have delivered grant deeds transferring
6 their 29.5% of the Real Property to Trustee ("Deeds"). The Deeds were recorded on July 2, 2021.¹
7 True and correct copies of the Deeds are attached to the Marshack Decl. as Exhibit "2."

8 Trustee and the TICs have entered into an Agreement memorializing the transfer of the TIC's
9 interests in the Property to Trustee ("Agreement"). The following is a brief summary of the terms set
10 forth in the Agreement between the Trustee and TICs:²

11 1. The TICs have delivered the Deeds to the Trustee so that the Property may be sold
12 subject to bankruptcy court approval;

13 2. Trustee is authorized to interlineate the Deeds to reflect \$0 documentary transfer tax,
14 that the transfer is exempt under Revenue and Taxation Code § 11911, and that the applicable
15 exemption is "This is a bonafide gift and the grantor received nothing in return;"

16 3. The interest transferred to the Estate by the Deeds is not an absolute gift (but the
17 interests transferred to the Estate are given without consideration);

18 4. Trustee shall be responsible for paying any documentary transfer taxes due as a
19 condition of recording the Deeds (no taxes were due as a condition of recordation);

20
21
22 ¹ On July 2, 2021, as Instrument No. 2021-0401985, a Grant Deed was recorded in the Riverside County
23 Recorder's Office, transferring Force Rubin 2 LLC's 3.7885% interest in the Property to Richard A.
24 Marshack, Chapter 11 Trustee for Glenroy Coachella, LLC ("FR2 Deed"). On July 2, 2021, as Instrument No.
25 2021-0401986, a Grant Deed was recorded in the Riverside County Recorder's Office, transferring Force
26 Rubin LLC's 21.2115% interest in the Property to Richard A. Marshack, Chapter 11 Trustee for Glenroy
27 Coachella, LLC ("FR Deed"). On July 2, 2021, as Instrument No. 2021-0401987, a Grant Deed was recorded
28 in the Riverside County Recorder's Office, transferring Coachella Resort, LLC's 4.6% interest in the Property
to Richard A. Marshack, Chapter 11 Trustee for Glenroy Coachella, LLC ("CR Deed") (collectively, the FR2
Deed, FR Deed and CR Deed are referred to as the "Deeds.")

² All interested parties are advised to consult the Agreement for all terms and conditions. A true and correct
copy of the Agreement is attached as **Exhibit "1."** The description of the terms is a summary only.

1 5. If the Court orders abandonment of the Property, or if the Court does not enter an
2 order approving a sale by December 31, 2021, Trustee will reconvey the 29.5% to the transferors in
3 the same percentages owned pre-transfer; and

4 6. If Trustee sells the Property for an amount sufficient to pay all allowed claims
5 secured by liens against the Property and costs of sale (excluding administrative costs of the
6 bankruptcy estate), Trustee will pay the TICs their respective share of the net sale proceeds.

7 **D. Legal Authority**

8 **1. Trustee may accept the Deeds under the proposed terms and**
9 **conditions.**

10 Section 363(b) of the Bankruptcy Code provides that a trustee, “after notice and a hearing,
11 may use, sell, or lease, other than in the ordinary course of business, property of the estate”
12 Debtor’s interest in the Real Property as of the petition date, the TICs’ former 29.5% interest in the
13 Real Property which was transferred to the Trustee, and the Deeds transferring the TICs’ interest to
14 the Trustee constitute property of the Estate. The use, sale, or lease of estate property outside the
15 ordinary course of business should be authorized when supported by a valid business purposes. *See,*
16 *e.g., In re 240 North Brand Partners, Ltd.*, 200 B.R. 653, 659 (9th Cir. BAP 1996) (“As a result,
17 debtors who wish to utilize § 363(b) to dispose of property of the estate must demonstrate that such
18 disposition has a valid business justification.”); *In re Montgomery Ward Holding Corp.*, 242 B.R.
19 147, 153 (Bankr. D. Del. 1999) (“In determining whether to authorize the use, sale or lease of
20 property of the estate under this section, courts require the debtor to show that a sound business
21 purpose justifies such actions.”).

22 Trustee’s acceptance, recordation, and potential reconveyance of the Deeds as contemplated
23 by the Agreement may not be within Debtor’s ordinary course of business. Accordingly, Trustee
24 seeks Court approval. The facts surrounding this case support the Trustee’s decision to enter into the
25 Agreement. Specifically, the Trustee intends to sell the Real Property, and he believes that the sale
26 of the Property will provide a significant and realizable benefit to creditors of the Estate. Absent
27 approval of the Agreement, Trustee would be required to prevail in an adversary proceeding under
28 11 U.S.C. § 363(h) before being able to sell the entirety of the Real Property. Aside from the

1 inherent risk associated with litigation against the TICs, the adversary case would also render the
2 sale more difficult, time-consuming, and costly to the Estate. Any delay selling the Real Property
3 poses substantial risk to the Estate because secured creditors could seek relief from stay and
4 foreclose. As such, the Trustee submits that there is sufficient “business justification” to grant the
5 Motion.

6 Trustee does not believe that the Agreement represents a compromise of any estate claim. As
7 such, approval of the Agreement under Rule 9019 of the Federal Rules of Bankruptcy Procedure is
8 unnecessary. Instead, the Agreement is similar to a stipulated judgment under Section 363(h) in that
9 the Estate is now the 100% owner of title to the Real Property and may sell such property pursuant
10 to any agreement approved by the court including cash, credit, or combination of both. If any court-
11 approved sale should generate sufficient proceeds to pay all allowed secured claims in full, the TICs
12 have retained their right to receive their share of the net proceeds after costs of sale.

13 If the Court denies this Motion, Trustee intends to abandon the Estate’s interest in the
14 Property since he will be unable to proceed with any potential sale. All potentially interested buyers
15 have conditioned their interest on Trustee being able to convey 100% of the title to the Property. To
16 that end, Trustee is in the process of filing and serving a separate motion seeking authority for
17 abandonment which motion will be filed no later than July 21, 2021. If this Motion is granted,
18 Trustee will withdraw the request for abandonment. But, if this Motion is denied, the motion for
19 abandonment will proceed because Trustee wants to avoid any potential harm to the Estate from a
20 foreclosure and the single asset real estate deadline has already expired.

21 **E. Conclusion**

22 For all the foregoing reasons, Trustee requests that the Court grant this Motion and enter an
23 Order:

- 24 1. Authorizing Trustee to enter the Agreement with the transferred interests becoming
25 property of the estate;
- 26 2. Authorizing Trustee to reconvey the 29.5% to the TICs if the Estate abandons its
27 interest in the Real Property pursuant to separate court motion and order or if the Trustee is unable to
28 sell the Real Property by December 31, 2021; and

1 3. For such other and further relief as set forth herein and as the Court deems just and
2 proper under the circumstances of this case.

3
4 Dated: July 12, 2021

MARSHACK HAYS LLP

5 By: /s/ D. Edward Hays
6 D. EDWARD HAYS
7 CHAD V. HAES
8 Attorneys for Chapter 11 Trustee,
9 Richard A. Marshack
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Declaration of Richard A. Marshack

I, RICHARD A. MARSHACK, declare and state:

1. I am the duly-appointed Chapter 11 Trustee of the bankruptcy estate ("Estate") of Glenroy Coachella, LLC ("Debtor"). The matters stated below are within my own knowledge or information and, if called upon to testify, I could and would competently testify thereto.

1. I make this declaration in support of my Motion to Convert Chapter 11 Case to One Under Chapter 7 Pursuant to 11 U.S.C. §1112(b) ("Motion.").

2. I reviewed the docket in this case prior to execution of this Declaration to refresh my memory as to the dates on which particular documents were filed.

3. On February 15, 2021, Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code.

4. On March 19, 2021, as Dk. No. 126, the Court entered an order approving the United States Trustee's application for the appointment of a Chapter 11 Trustee.

5. Debtor's primary asset is a 70.5% interest in real property located at 84150 Avenue 48, Coachella, California 92201 ("Real Property"), which includes a luxury hotel project. Debtor owns the Real Property as a tenant-in-common with three other non-debtor entities: Force Rubin LLC (3.7885%); Force Rubin 2, LLC (21.2115%); and Coachella Resort, LLC (4.5%) (collectively, the "TICs").

6. A true and correct copy of the Agreement is attached here as Exhibit "1."

7. Since my appointment, my professionals and I have investigated and spent hundreds of hours conducting due diligence analyzing whether there was any value to be realized from the Real Property.

8. I have met with a number of parties interested in purchasing the Real Property. I have also has a signed letter of intent with one prospective purchaser. Finally, I am finalizing an agreement with the largest creditor secured by the Real Property, U.S. Real Estate Credit Holdings III-A, upon which it will consent to a sale free and clear of its deed of trust.

1 9. To facilitate a sale of the Real Property, the TICs have delivered grant deeds
2 transferring their 29.5% of the Real Property to the Trustee ("Deeds"). The Deeds were recorded on
3 July 2, 2021. A true and correct copy of the Deeds are attached here as Exhibit "2."

4 10. I believe that there is sufficient "business justification" to grant the Motion.

5 I declare that the foregoing is true and correct under the penalty of perjury. Executed July 13,
6 2021.

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8 _____
9 RICHARD A. MARSHACK
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EXHIBIT 1

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 CHAD V. HAES, #2767221
chaes@marshackhays.com
3 MARSHACK HAYS LLP
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 11 Trustee,
7 RICHARD A. MARSHACK

8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

10 In re

Case No. 2:21-bk-11188-BB

11 GLENROY COACHELLA, LLC,

Chapter 11

12 Debtor.

13 STIPULATION RE: TRANSFERS OF
14 TENANT-IN-COMMON INTERESTS IN
REAL PROPERTY TO THE BANKRUPTCY
ESTATE

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17 TO THE HONORABLE SHERI BLUEBOND, UNITED STATES BANKRUPTCY JUDGE, THE
18 DEBTOR, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
19 PARTIES:

20 This stipulation is entered into between Richard A. Marshack, in his capacity as Chapter 11
21 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Glenroy Coachella, LLC (“Debtor”)
22 owner of a 70.5% tenant-in-common interest in real property, on the one hand, and Force Rubin
23 LLC, Force Rubin 2, LLC, and Coachella Resort, LLC (collectively, TICs), holders of the remaining
24 29.5% tenant-in-common interests, on the other hand, by and through their respective counsel
25 (collectively, Trustee and TICS are referred to as the “Parties”).

26 **Recitals**

27 A. On February 15, 2021, Debtor filed a voluntary petition for relief under Chapter 11 of
28 the United States Code, commencing bankruptcy case no. 2:21-bk-11188-BB.

1 B. Debtor's primary asset is a 70.5% tenant-in-common interest in the real property
2 located at 84150 Avenue 48, Coachella, California 92201 ("Real Property"), which includes a luxury
3 hotel project.

4 C. On March 19, 2021, as Dk. No. 126, the Court entered an order approving the United
5 States Trustee's application for the appointment of a Chapter 11 Trustee. Richard A. Marshack is the
6 duly-appointed and acting Chapter 11 Trustee.

7 D. Debtor owns approximately 70.5% of the Real Property as a tenant-in-common with
8 three other non-debtor entities: Force Rubin LLC (3.7885%); Force Rubin 2, LLC (21.2115%); and
9 Coachella Resort, LLC (4.5%) (previously defined as the TICs). To facilitate a sale of the Real
10 Property, the TICs have delivered grant deeds transferring their approximate 29.5% of the Real
11 Property to the Trustee ("Deeds") on the following terms and conditions. The Deeds were recorded
12 on July 2, 2021.

13 Stipulation

14 WHEREFORE, the Parties agree and stipulate as follows:

15 1. The Parties acknowledge that the TICs have delivered the Deeds to the Trustee so that
16 title to 100% of the Property will be held by the Estate so that the Trustee may sell it subject to
17 bankruptcy court approval;

18 2. The Parties acknowledge that Trustee was authorized to interlineate the Deeds to
19 reflect \$0 documentary transfer tax, that the transfers are exempt under Revenue and Taxation Code
20 § 11911, and that the applicable exemption is "This is a bonafide gift and the grantor received
21 nothing in return;"

22 3. The Parties acknowledge that the Deeds were accepted and recorded without payment
23 of any documentary transfer taxes. Should any such taxes ultimately be due to the County of
24 Riverside, Trustee shall be responsible for paying any such taxes arising from receipt of the Deeds.

25 4. Trustee acknowledges that the interests transferred to the Estate by the Deeds was not
26 an absolute gift of all of the TICs' interests in the Property. Instead, if the Court orders abandonment
27 of the Property, or if the Court does not enter an order approving a sale by December 31, 2021,
28 Trustee will reconvey the 29.5% back to the TICs in the same percentages owned pre-transfer;

1 5. Further, if Trustee sells the Property for an amount sufficient to pay all allowed
2 claims secured by liens against the Property and costs of sale (excluding administrative costs of the
3 bankruptcy estate), Trustee will pay the TICs their respective share of the net sales proceeds;

4 6. This Stipulation supersedes all prior discussions and agreements between the Parties;
5 and

6 7. This Stipulation may be executed in one or more counterparts and facsimile or
7 electronic signatures may be used in filing this document.

8
9
10 Dated: July 7, 2021

MARSHACK HAYS LLP

/s/ D. Edward Hays

11 By: _____

12 D. EDWARD HAYS
13 CHAD V. HAES
14 TINHO MANG
Attorneys for Chapter 11 Trustee,
RICHARD A. MARSHACK

15 Dated: July 7, 2021

MESSINA & HANKIN LLP

16
17 By:  _____

18 EVAN L. SMITH
19 Attorneys for Tenants-in-Common,
20 FORCE RUBIN LLC, FORCE RUBIN 2,
21 LLC and COACHELLA RESORT, LLC
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EXHIBIT 2

ACCOMMODATION RECORDING

DOC # 2021-0401985

07/02/2021 09:48 AM Fees: \$258.00

Page 1 of 4

Recorded in Official Records

County of Riverside

Peter Aldana

Assessor-County Clerk-Recorder

RECORDING REQUESTED BY:

Fidelity National Title P.C.

Richard A. Marshack, Bankruptcy Trustee

Mail tax statement to,

AND WHEN RECORDED MAIL TO:

Richard A. Marshack, Bankruptcy Trustee

Marshack Hays LLP

870 Roosevelt

Irvine, CA 92620

**This document was electronically submitted
to the County of Riverside for recording**
Receipted by: DEYANIRA #293

TITLE OF DOCUMENT: *Grant Deed*

APN: *603-220-061*

OTT: *Ø*

TRA: *012-037*

RECORDING REQUESTED BY

Richard Marshack

AND WHEN RECORDED MAIL TO:

Richard Marshack
Marshack Hays
870 Roosevelt
Irvine, CA 92620

THIS SPACE FOR RECORDER'S USE

APN: 603-220-061, 603-220-065, 603-220-067, 603-220-068 AND 603-220-069

Grant Deed

Documentary transfer tax is \$ Ø

If exempt, enter R&T code: _____

Explanation: The documentary transfer tax is computed on the full value less value of liens or encumbrances remaining at time of sale.

**"THIS IS A BONAFIDE GIFT AND
THE GRANTOR RECEIVED NOTHING
IN RETURN, R & T 11911."**

Declaration of Exemption from Gov't Code §27388.1 Fee

- ☐ Transfer is exempt from fee per GC §27388.1(a)(2);
- ☐ recorded concurrently "in connection with" transfer subject to Documentary Transfer Tax
- ☐ recorded concurrently "in connection with" a transfer of residential dwelling to an owner-occupier
- ☐ Transfer is exempt from fee per GC 27388.1(a)(1):
- ☐ Fee cap of \$225.00 reached
- ☐ Not related to real property

For a valuable consideration, receipt of which is hereby acknowledged,

GRANTOR(S) Force Rubin 2, LLC, a Delaware limited liability company, as to an undivided 3.7885% interest.

hereby grant(s) to **GRANTEE(S)**: Richard A. Marshack, Chapter 11 Trustee for Glenroy Coachella, LLC

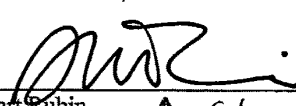
the following real property in the City of Coachella, County of Riverside, California:

See Exhibit "A" attached.

Dated: 5/12/2021

FORCE RUBIN 2, LLC

A Delaware limited liability company


A. Stuart Rubin
Title: Manager

A. Stuart Rubin

Mail tax statement to same as above

ACKNOWLEDGMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Los Angeles)

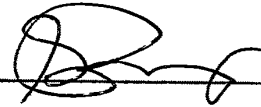
On 5/12/2021 before me, Sherri Perry Notary Public
(insert name and title of the officer)

personally appeared A. Stuart Rubin
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s)
is/are subscribed to the within instrument and acknowledged to me that he/she/they executed
the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the
instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the
instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



**EXHIBIT A
LEGAL DESCRIPTION**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED COACHELLA IN THE COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCELS 1, 2, 4, 5 AND 6 OF PARCEL MAP NO. 37310, IN THE CITY OF COACHELLA, COUNTY OF
RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 243, PAGES 82 TO 84
INCLUSIVE OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

APN: 603-220-061, 603-220-065, 603-220-067, 603-220-068 AND 603-220-069

ACCOMMODATION RECORDING

DOC # 2021-0401986

07/02/2021 09:48 AM Fees: \$33.00

Page 1 of 4

Recorded in Official Records

County of Riverside

Peter Aldana

Assessor-County Clerk-Recorder

RECORDING REQUESTED BY:

Fidelity National Title O.C.

Richard A. Marshack, Bankruptcy Trustee

AND WHEN RECORDED MAIL TO:

Richard A. Marshack, Bankruptcy Trustee
Marshack Hays LLP
870 Roosevelt
Irvine, CA 92620

**This document was electronically submitted
to the County of Riverside for recording**
Received by: DEYANIRA #293

TITLE OF DOCUMENT: *Grand Deed*

APN: *603-220-081*

OTT: *Ø*

TRA: *012-037*

Mail tax statement to same as above

RECORDING REQUESTED BY

Richard Marshack

AND WHEN RECORDED MAIL TO:

Richard Marshack
Marshack Hays
870 Roosevelt
Irvine, CA 92620

THIS SPACE FOR RECORDER'S USE

APN: 603-220-061, 603-220-065, 603-220-067, 603-220-068 AND 603-220-069

Grant Deed

Documentary transfer tax is \$ 0
If exempt, enter R&T code: _____
Explanation: The documentary transfer tax is computed on the full value less value of liens or encumbrances remaining at time of sale.

**"THIS IS A BONAFIDE GIFT AND
THE GRANTOR RECEIVED NOTHING
IN RETURN, R & T 11911."**

Declaration of Exemption from Gov't Code §27388.1 Fee

- ☐ Transfer is exempt from fee per GC §27388.1(a)(2);
☐ recorded concurrently "in connection with" transfer subject to Documentary Transfer Tax
☐ recorded concurrently "in connection with" a transfer of residential dwelling to an owner-occupier
☐ Transfer is exempt from fee per GC 27388.1(a)(1):
☐ Fee cap of \$225.00 reached
☐ Not related to real property

For a valuable consideration, receipt of which is hereby acknowledged,
GRANTOR(S) Force Rubin LLC, a Delaware limited liability company, as to an undivided 21.2115% interest.

hereby grant(s) to GRANTEE(S): Richard A. Marshack, Chapter 11 Trustee for Glenroy Coachella, LLC

the following real property in the City of Coachella, County of Riverside, California:

See Exhibit "A" attached.

Dated: 5/12/2021

FORCE RUBIN, LLC
A Delaware limited liability company

[Signature]
A. Stuart Rubin
Title: Manager

Mail tax statement to same as above

ACKNOWLEDGMENT

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Los Angeles)

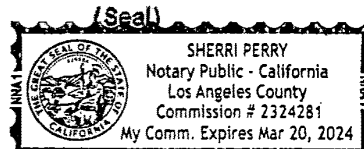
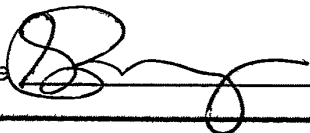
On 5/12/2021 before me, Sherri Perry Notary Public
(insert name and title of the officer)

personally appeared A. Stuart Rubin
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



**EXHIBIT A
LEGAL DESCRIPTION**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED COACHELLA IN THE COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCELS 1, 2, 4, 5 AND 6 OF PARCEL MAP NO. 37310, IN THE CITY OF COACHELLA, COUNTY OF
RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 243, PAGES 82 TO 84
INCLUSIVE OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

APN: 603-220-061, 603-220-065, 603-220-067, 603-220-068 AND 603-220-069

ACCOMMODATION RECORDING

DOC # 2021-0401987

07/02/2021 09:48 AM Fees: \$248.00

Page 1 of 4

Recorded in Official Records

County of Riverside

Peter Aldana

Assessor-County Clerk-Recorder

RECORDING REQUESTED BY:

Fidelity National Title O.C.
Richard A. Marshack, Bankruptcy Trustee

**This document was electronically submitted
to the County of Riverside for recording**
Receipted by: DEYANIRA #293

AND WHEN RECORDED MAIL TO:

Richard A. Marshack, Bankruptcy Trustee
Marshack Hays LLP
870 Roosevelt
Irvine, CA 92620

TITLE OF DOCUMENT: *Grand Deed*

APN 603-220-061

OTT: Ø

TRA: 012-037

Mail tax statement to same as above

RECORDING REQUESTED BY

Richard Marshack

AND WHEN RECORDED MAIL TO:

Richard Marshack
Marshack Hays
870 Roosevelt
Irvine, CA 92620

THIS SPACE FOR RECORDER'S USE

APN: 603-220-061, 603-220-065, 603-220-067, 603-220-068 AND 603-220-069

Grant Deed

Documentary transfer tax is \$ 0
If exempt, enter R&T code: _____
Explanation: The documentary transfer tax is computed on the full value less value of liens or encumbrances remaining at time of sale.

"THIS IS A BONAFIDE GIFT AND
THE GRANTOR RECEIVED NOTHING
IN RETURN, R & T 11911."

Declaration of Exemption from Gov't Code §27388.1 Fee

- ☐ Transfer is exempt from fee per GC §27388.1(a)(2);
☐ recorded concurrently "in connection with" transfer subject to Documentary Transfer Tax
☐ recorded concurrently "in connection with" a transfer of residential dwelling to an owner-occupier
☐ Transfer is exempt from fee per GC 27388.1(a)(1):
☐ Fee cap of \$225.00 reached
☐ Not related to real property

For a valuable consideration, receipt of which is hereby acknowledged,
GRANTOR(S) Coachella Resort, LLC, a California limited liability company, as to an undivided 4.5% interest.


hereby grant(s) to GRANTEE(S): Richard A. Marshack, Chapter 11 Trustee for Glenroy Coachella, LLC

the following real property in the City of Coachella, County of Riverside, California:

See Exhibit "A" attached.

Dated: MAY 14TH 2021

COACHELLA RESORT, LLC
A California limited liability company



Elliott Barton Lander, M.D., Trustee of the Elliott Lander
Separate Property Trust dated December 2, 2009, Its Member

Mail tax statement to same as above

CALIFORNIA ALL PURPOSE ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Riverside

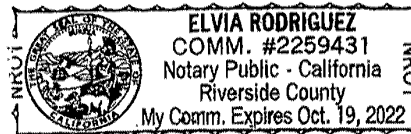
On May 14, 2021, before me, Elvia Rodriguez, Notary Public, personally appeared:

Elliot Barton Lander

Who proved to me on the basis of satisfactory evidence be the person (s) whose name (s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity (ies), and that by his/her/their signature (s) on the instrument the person (s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Elvia Rodriguez
Elvia Rodriguez

My Commission Expires: October 19, 2022

OPTIONAL

DESCRIPTION OF THE ATTACHED DOCUMENT

Title or Type of Document: *Grant Deed*

Document Date: *May 14, 2021*

Number of pages:

**EXHIBIT A
LEGAL DESCRIPTION**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED COACHELLA IN THE COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCELS 1, 2, 4, 5 AND 6 OF PARCEL MAP NO. 37310, IN THE CITY OF COACHELLA, COUNTY OF
RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 243, PAGES 82 TO 84
INCLUSIVE OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

APN: 603-220-061, 603-220-065, 603-220-067, 603-220-068 AND 603-220-069

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **CHAPTER 11 TRUSTEE'S MOTION FOR ORDER APPROVING AGREEMENT RE: ESTATE'S RECEIPT OF DEEDS FROM TENANTS-IN-COMMON; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF RICHARD A. MARSHACK IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 13, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **July 13, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

GLENROY COACHELLA, LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY
OTHER AGENT AUTHORIZED BY
APPOINTMENT OR LAW TO
RECEIVE SERVICE
1801 S. LA CIENEGA BLVD., SUITE
301
LOS ANGELES, CA 90035-4658

CREDITOR'S COUNSEL

EVAN L. SMITH
MESSINA & HANKIN LLP
24910 LAS BRISAS ROAD, SUITE 102
MURRIETA, CA 92562

CREDITOR'S COUNSEL

THOMAS J. POLIS, ESQ.
POLIS & ASSOCIATES, APLC
19800 MACARTHUR BLVD, STE 1000
IRVINE, CA 92612-2433

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 13, 2021**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA OVERNIGHT MAIL:

PRESIDING JUDGE'S COPY

HONORABLE SHERI BLUEBOND
UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
EDWARD R. ROYBAL FEDERAL BUILDING AND COURTHOUSE
255 E. TEMPLE STREET, SUITE 1534 / COURTROOM 1539
LOS ANGELES, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 13, 2021
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **ATTORNEY FOR INTERESTED PARTY EFO FINANCIAL GROUP LLC:** Steven M Berman sberman@slk-law.com, awit@shumaker.com; bgasaway@shumaker.com
- **ATTORNEY FOR CREDITOR SAXON ENGINEERING SERVICES INC AND COMMITTEE OF UNSECURED CREDITORS:** Daren Brinkman office@brinkmanlaw.com, 7764052420@filings.docketbird.com
- **ATTORNEY FOR CREDITOR DOUG WALL CONSTRUCTION:** Caroline Djang caroline.djang@bbklaw.com, laurie.verstegen@bbklaw.com; wilma.escalante@bbklaw.com
- **INTERESTED PARTY COURTESY NEF:** Jenny L Doling JD@jdl.law, dolingjr92080@notify.bestcase.com
- **ATTORNEY FOR CREDITORS LASERSCOPIC MEDICAL CLINIC, LLC; LASERSCOPIC SPINAL CENTERS OF AMERICA, INC.; AND JOE SAMUEL BAILEY:** Jonathan R Doolittle jonathan.doolittle@pillsburylaw.com
- **ATTORNEY FOR U.S. TRUSTEE (LA):** Eryk R Escobar eryk.r.escobar@usdoj.gov
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Chad V Haes chaes@marshackhays.com, chaes@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com; cmendoza@marshackhays.com; kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR BLAIR AIR, INC.:** Brian S Harnik bharnik@rhlawfirm.com, bharnik@rhlawfirm.com
- **INTERESTED PARTY COURTESY NEF:** Douglas Harris Douglas.harris@alston.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR ORCO BLOCK & HARDSCAPE:** William C Hoggard wch@wchlawgroup.com, admin@wchlawgroup.com
- **INTERESTED PARTY COURTESY NEF:** Mark S Horoupian mhoroupian@sulmeyerlaw.com, mhoroupian@ecf.inforuptcy.com; ccaldwell@sulmeyerlaw.com
- **ATTORNEY FOR CREDITOR U.S. REAL ESTATE CREDITOR HOLDINGS III-A, LP:** Marsha A Houston mhouston@reedsmith.com
- **INTERESTED PARTY COURTESY NEF:** Michael S Kogan mkogan@koganlawfirm.com
- **ATTORNEY FOR INTERESTED PARTY GARY STIFFELMAN:** Timothy R Laquer trl@ddclaw.com, trl@ddclaw.com
- **INTERESTED PARTY COURTESY NEF:** Leib M Lerner leib.lerner@alston.com, autodockettest-lax@alston.com
- **ATTORNEY FOR DEBTOR GLENROY COACHELLA, LLC:** Crystle Jane Lindsey crystle@wsrlaw.net, crystle@cjlalaw.com; gabby@wsrlaw.net; dairi@wsrlaw.net
- **INTERESTED PARTY COURTESY NEF:** Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com
- **TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR) pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titledi.com
- **ATTORNEY FOR CREDITOR PORSCHE FINANCIAL SERVICES, INC. dba BENTLEY FINANCIAL SERVICES and CREDITOR PORSCHE LEASING LTD:** Stacey A Miller smiller@tharpe-howell.com
- **ATTORNEY FOR INTERESTED PARTY STUART RUBIN:** Sean A OKeefe sokeefe@okeefelc.com, seanaokeefe@msn.com
- **INTERESTED PARTY COURTESY NEF:** R Gibson Pagter, Jr.: gibson@ppilawyers.com, ecf@ppilawyers.com; pagterrr51779@notify.bestcase.com
- **INTERESTED PARTY COURTESY NEF:** Matthew D Pham mpham@hahnlawyers.com, marias@hahnlawyers.com; mpham@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR LAW OFFICES OF JEFFREY D SEGAL, A PROFESSIONAL CORPORATION:** Sheila M Pistone sheila@pistonelawoffice.com, sheilapistone@yahoo.com
- **ATTORNEY FOR CREDITOR GF INVESTMENT GROUP, INC. DBA THE INVESTMENT CENTER, A CALIFORNIA CORPORATION:** Maria Plumtree agrow@plumtreelaw.com, mplumtree@plumtreelaw.com
- **ATTORNEY FOR CREDITORS AL MILLER & SONS ROOFING CO INC; APPLE J PLUMBING; DESERT PALM ELECTRIC INC; JACOBSSON ENGINEERING CONSTRUCTION INC; MASCORRO CONCRETE CONSTRUCTION INC; TANDEM WEST GLASS INC; TEMALPAKH INC DBA THE WORKS FLOOR & WALL:** Thomas J Polis tom@polis-law.com, paralegal@polis-law.com; r59042@notify.bestcase.com
- **ATTORNEY FOR CREDITOR CALIFORNIA STATEWIDE COMMUNITIES DEVELOPMENT AUTHORITY:** Debra Riley driley@allenmatkins.com

- **ATTORNEY FOR CREDITOR U.S. REAL ESTATE CREDITOR HOLDINGS III-A, LP:** Christopher O Rivas
crivas@reedsmith.com, chris-rivas-8658@ecf.pacerpro.com
- **ATTORNEY FOR DEBTOR GLENROY COACHELLA, LLC:** James R Selth jim@wsrlaw.net, jselth@yahoo.com;
dairi@wsrlaw.net; gabby@wsrlaw.net; vinnet@ecf.inforuptcy.com
- **ATTORNEY FOR INTERESTED PARTY LATHAM MANAGEMENT & CONSULTING SERVICES, INC.:** Leonard
M Shulman lshulman@shulmanbastian.com
- **ATTORNEY FOR INTERESTED PARTIES ELLIOT LANDER AND STUART RUBIN:** Evan L Smith
els@elsmithlaw.com
- **ATTORNEY FOR INTERESTED PARTY EDWIN W. LESLIE, RECEIVER:** Alan G Tippie
atippie@sulmeyerlaw.com, atippie@ecf.courtdrive.com; pdillamar@sulmeyerlaw.com
- **U.S. TRUSTEE (LA):** United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- **ATTORNEY FOR DEBTOR GLENROY COACHELLA, LLC:** Daniel J Weintraub dan@wsrlaw.net,
vinnet@ecf.inforuptcy.com; gabby@wsrlaw.net; dairi@wsrlaw.net

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 26 Executive Park, Suite 250, Irvine, CA 92614.

A true and correct copy of the foregoing document entitled: **DECLARATION OF SEAN A. O'KEEFE IN SUPPORT OF MOTION TO DISMISS COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6); AND DEMAND FOR JURY TRIAL AS TO ANY SURVIVING CLAIMS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On March 20, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On March 20, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, March 20, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Sheri Bluebond
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1534
Los Angeles, CA 90012

☒ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

3/20/2023

Date

Sean A. O'Keefe

Printed Name

/s/ Sean A. O'Keefe

Signature

NEF LIST

- Richard A Marshack (TR) pkraus@marshackhays.com,
rmarshack@iq7technology.com;ecf.alert+Marshack@titlexi.com
- Ryan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

MAILING LIST

Asr Development Co
1801 South La Cienega Blvd. Ste. 301
Los Angeles, Ca 90035

Abraham Stuart Rubin
c/o Evan L. Smith, Esq.
Messina & Hankin LLP
24910 Las Brisas Road, Suite 102
Murrieta, CA 92562

Joseph Rubin
715 N. Alpine Dr.
Beverly Hills, CA 90210